



August 1, 2008

Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairwoman Nichols:

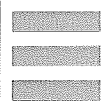
We thank you for the opportunity to comment on the California Air Resources Board Draft Scoping Plan. We believe that a statewide ISR for greenhouse gases is an innovative and effective way to reduce vehicle miles travelled (VMT) now and well into the future, while simultaneously helping to build vibrant, mobile, livable, and healthy communities. Specifically, we would like to share how our experience as developers leads us to support the inclusion of an Indirect Source Rule (ISR) in the Final Scoping Plan.

LJ Urban is an eco-urban development company with the goal of making cities better. We believe this is accomplished through density and design and strive to get people out of cars and interacting with each other to form a strong community. We have completed our first LEED ND project at B Street West in West Sacramento and are currently working on several projects in the core area of West Sacramento and Sacramento. We pride ourselves on putting our belief into action – that buyers will trade in traffic, commutes, and tract homes to move to the downtown core and walk to work and shop. We are reducing parking ratios and providing lots of bike parking to encourage people to leave their cars parked.

Our development projects within the urban core are in high demand and return a solid net profit. While our counterparts that develop far from urban centers have been highly affected by the state's economic downturn and high energy and fuel costs, our projects continue to attract many potential buyers. Concerns expressed that the infrastructure, permitting, and other costs of this type of development are offset by their rising demand in the market.

Unfortunately, the Draft Scoping Plan does not include an ISR as a measure to achieve state-mandated GHG reductions, despite the fact that they have been proven in other contexts to reduce emissions and prevent pollution. The San Joaquin Valley Air Pollution Control District, for example, adopted an advanced indirect source rule in December 2005 to help with their air quality attainment goals. The San Joaquin Valley rule provides a solid framework for a statewide approach to indirect source pollution control.

We believe that the Indirect Source Rule should be included as a recommended measure in CARB's Final Scoping Plan and that each of the 35 air districts in the state should adopt an ISR. It has been proven to work, has the potential to reduce VMT and GHGs, and maintain those reductions over the long run, and will not place an undue burden on the development community.



LJ Urban

Thank you for your time and consideration to this matter. If you have any questions, please call Steve Schweigerdt in our office at 916-329-3727 and visit our website to learn more about what we are doing – ljurban.com

Sincerely,

Levi Benkert

Steve Schweigerdt